

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA)	CASE NO.: 1:13 CR 126
)	
Plaintiff,)	JUDGE PEARSON
)	
vs.)	
)	
DIVNA MASLENJAK)	<u>DEFENDANT’S RESPONSE TO</u>
)	<u>GOVERNMENT’S MOTION TO</u>
)	<u>REVOKE CITIZENSHIP AND TO</u>
Defendant.)	<u>CANCEL NATURALIZATION</u>
)	<u>CERTIFICATE</u>

On July 7, 2014, the Government filed a pleading entitled Motion to Revoke Citizenship and Cancel Naturalization Certificate by the United States of America as to Divna Maslenjak. This is document 42 in this case.

The above-described relief sought by the Government was requested in Government’s motion to be ordered by the Court “...at the time she is sentenced on her conviction for naturalization fraud” as set forth on page 2 of that motion.

Defendant intends to appeal her conviction. Undersigned counsel for Defendant believes that Defendant will request the opportunity to receive appointed counsel in this regard.

Pending the resolution of such an appeal and determinations by the appropriate immigration authorities relating to Defendant’s citizenship status, Defendant requests that to the

extent it may appropriately do so, this Court stay the imposition and execution of any sanctions relating to Defendant's citizenship status pending the outcome of Defendant's appeal herein and in any immigration courts.

WHEREFORE, Defendant requests that the relief requesting this response to the Government's motion be granted in favor of Defendant, together with any further relief in this regard as the Court deems appropriate.

Respectfully submitted,

BUCKINGHAM, DOOLITTLE & BURROUGHS, LLC

By: /s/ Peter T. Cahoon

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PROOF OF SERVICE

I hereby certify that on August 6, 2014, a copy of the foregoing was electronically filed. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Peter T. Cahoon

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Attorney for Defendant